

**U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION IV
POLLUTION REPORT No. 20**

**Holtra Chem Chlor-Alkali Facility
One Industrial Drive
Riegelwood, Columbus County, NC**

TO: A. Shane Hitchcock, EPA
R. Donald Rigger, EPA
C. Geraghty, EPA
G. Tan, EPA
R. Davidson, EPA
J. Bateson, NCDENR
J. Stanley, NCDENR
B. Nelms, NCDENR
S. Carbonaro, EPA
S. Urquhart-Foster, EPA

FROM: Charles E. Fitzsimmons, OSC
USEPA Region 4/WMD/ERRB
4930 Old Page Rd.
RTP, NC 27587

DATE: May 30, 2003

I. BACKGROUND

Site No.:	A47J
Delivery Order No.:	N/A
Response Authority:	CERCLA
Incident Category:	State Referral
CERCLIS:	NCD097361018
NPL:	N
Site Category:	Industrial Chlor-alkali Facility
Responsible party:	Holtra Chem LLC, Honeywell Inc.

II. HISTORY

Refer to Action Memorandum, Consent Order, and previous POLREPs for site history.

III. SITUATION

Refer to initial and routine POLREPs for site situation.

IV. SITE ACTIVITIES

May 27 - 29, 2003

OSC Fitzsimmons provided on-site oversight of removal activities from May 27 - 29, 2003. START provided Responsible Party (RP) monitoring, site documentation, and on-site real-time air monitoring during the entire reporting week. The weather was rainy for most of the early part of the week with overcast clouds and temps in the 70s later in the week.

- Site activities for the week include the following. URS continued mercury cell cover removal, decontamination, and disassembly operations within the Old Mercury Cell Building. Disassembly of the covers for Cell nos. 22 and 23 were completed and operations on Cell No. 24, the final cell were initiated. All of 24 was disassembled and decontaminated at week's end. Once disassembled and decontaminated, cell covers are being placed on pallets and moved to the Material Staging Area (MSA) or Retort Pad Decontamination Area to dry prior to screening and placing into roll-off boxes.

- Process piping along the west side of the Old Mercury Cell Building continued to be cut, decontaminated, and removed. Pipe rack "F" dismantling and associated columns were completed this week. Work was initiated on pipe rack "G". Crane operations were completed on May 29, 2003. The rack and its components are being further disassembled on the ground.

- Waste water pre-treatment continues in the Primary Waste Water Treatment Plant (WWTP) which is located in the Brine MESS Area. Due to heavy rains this week the cell pit water level was up. This water was pumped to the #3 wastewater collection tank for batch treatment.

- URS work activities are currently estimated at 10 days behind the last approved project schedule. In total, one 25-yard hazardous-micro box, one 25-yard box of non-regulated material, two 30-yard boxes of non-hazardous construction debris, five 30-yard boxes of non-hazardous scrap metal, and one 5-yard box of non-hazardous scrap copper were transported off-site for recycling or disposal during the week. In addition to URS activities, plant personnel completed clearing debris from the scrap yard located south of the South Rainwater Pond.

- The final version of the Job Safety Analysis (JSA) for "Decontamination of the Denuder and Grids", which represents the second step of the mercury cell removal process, was provided to EPA, along with a preliminary draft version of the third step, "Removal and Decontamination of the Mercury Cells." A meeting with all impacted parties was conducted on 5/29 to go over the JSA and to assemble all comments so that it can be finalized for implementation.

- Monthly meeting was conducted on 5/28/03. Honeywell, URS, Jolly Corp., START-Weston, NCDENR, and EPA (OSC and RPM) were in attendance. OSC asked that HASP be amended to reflect actual personnel mercury monitoring program since original section has been modified to reflect real time exposures over the past month to site workers. OSC also asked that this section make it mandatory for any individual who will routinely enter the hot zone to be in a mercury monitoring program. OSC also reminded site personnel that we are now officially in hurricane season and as thus the hurricane response plan should be tested and all staged materials should

be checked to ensure their integrity. OSC discussed the necessity of bringing the project back on schedule. It is estimated that URS is some 12 days behind schedule due to a number of different reasons. OSC stressed the need to get caught up without negatively impacting site health and safety.

- Air sampling off-site was not conducted during this work week due to forecasted rain and moderate temperatures; Real-time air monitoring was conducted at the established off-site air sampling stations and mercury levels were not detected above background concentrations (<10 ng/m³).

On-site real-time air monitoring results from the exclusion zone perimeter locations continue to show slightly elevated readings immediately adjacent to the north and west sides of the Old Mercury Cell Building; however, these levels drop off substantially upon reaching the site road system, located 10 feet beyond the monitoring points. Mercury vapor levels in the Old Mercury Cell Building ranged from 0.003 to 0.300 mg/m³.

PPE requirements continue to be Level B for cell pit operations and Level C for other building locations. Exterior operations are conducted in Level D PPE (excluding line breaking operations).

V. FUTURE ACTIVITIES

The next All-Hands Monthly Meeting will occur at 12:30 PM, June 24, 2003.

There will be no EPA OSC oversight week of June 02 due to mandatory ERRB-Branch training in Atlanta.

Site work during the next week will include pipe rack "G" dismantling and disposal. Cell bed #24 cleaning will be initiated.

VI. DISPOSAL SUMMARY

Disposal Summary for Week of May 26, 2003			
Waste Stream	Disposal Destination	Quantity Shipped This Week	Quantity Shipped To Date
Hazardous - Micro	Waste Management - Emelle Treatment Facility Emelle, AL	none	(10) 25-yd boxes (2) 20-yd boxes
Non-Regulated Material (Directly Land Filled)	Waste Management - Emelle Treatment Facility Emelle, AL	none	(18) 25-yd boxes
Hazardous - Macro (Including ACM Hazardous)	Waste Management - Emelle Treatment Facility Emelle, AL	(2) 20 yd. boxes	(20) 20-yd boxes

Disposal Summary for Week of May 26, 2003			
D009 (Wastewater Filter Cake)	EQ - Michigan Disposal Waste Treatment Belleville, MI	None	(4) boxes (est. 90,000 lbs.)
ACM (Non-Haz)	Anson Waste Management Facility Polkton, NC	Task Complete	(3) 40-yd boxes
Non-Haz Construction Debris	Sampson Co. Disposal Facility Roseboro, NC	none	(12) 30-yd boxes (75,520 lbs.)
Non-Haz Scrap Metal	Southern Metals Recycling Wilmington, NC	3 boxes	(22) 30-yd boxes (est. 275,000 lbs.)
Non-Haz Scrap Titanium	Southern Metals Recycling Wilmington, NC	None	None
Non-Haz Scrap Copper	Southern Metals Recycling Wilmington, NC	none	(2) 5-yd boxes 25,000lbs
Reclaimed Elemental Mercury (for Reuse)	Goldsmith Evanston, IL	None	(5) one ton cylinders